

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NEW YORKERS FOR RELIGIOUS LIBERTY, INC.,
GENNARO AGOVINO, CURTIS CUTLER, LIZ
DELGADO, JANINE DEMARTINI, BRENDAN
FOGARTY, SABINA KOLENOVIC, KRISTA O'DEA,
DEAN PAOLILLO, DENNIS PILLET, MATTHEW
RIVERA, LAURA SATIRA, FRANK SCHIMENTI,
JAMES SCHMITT, individually and on behalf of all other
persons similarly situated,

Plaintiffs,

-against-

THE CITY OF NEW YORK; ERIC ADAMS, in his official
capacity as Mayor of the City of New York, DAVE
CHOKSHI, in his official capacity as Health Commissioner
of the City of New York, and ROBERTA REARDON, in
her capacity as New York State Commissioner of Labor,

Defendants.

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BILAL HAIDER, declares pursuant to 28 U.S.C. § 1746, under penalty of
perjury, that the following is true and correct:

1. I am the attorney in the Office of George M. Pestana, Corporation Counsel of the
City of New York, assigned to represent Defendants City of New York, Eric Adams, and Dave
Chokshi, in the above-referenced action. As such, I am familiar with the facts stated below and
hereby submit this declaration to place the relevant documents on the record in support of
Defendants' Memorandum of Law in Opposition of Plaintiffs' Motion for a Preliminary
Injunction.

2. Annexed hereto as Exhibit A is a copy of the Affirmation of Daniel Pollack dated
February 10, 2022 and filed in New York State Supreme Court, County of New York on

**DECLARATION OF BILAL
HAIDER IN SUPPORT OF
DEFENDANTS CITY OF
NEW YORK'S, ERIC
ADAMS'S, AND DAVE
CHOKSHI'S
MEMORANDUM OF LAW
IN OPPOSITION OF
PLAINTIFFS' MOTION
FOR A PRELIMINARY
INJUNCTION**

22 Civ. 752 (DG) (VMS)

February 10, 2022 in the matter of The New York City Municipal Labor Committee, by its Chair Harry Nespoli, et al. v. City of New York, et al., Index No. 151169/2022.

3. Annexed hereto as Exhibit B is a copy of the Affirmation of Eric Eichenholtz dated February 9, 2022 and filed in New York State Supreme Court, County of New York on February 10, 2022 in the matter of The New York City Municipal Labor Committee, by its Chair Harry Nespoli, et al. v. City of New York, et al., Index No. 151169/2022.

Dated: New York, New York
February 11, 2022

GEORGIA M. PESTANA
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By: Bilal Haider /s
Bilal Haider
Assistant Corporation Counsel

cc: Counsel of Record (By ECF)